

*Hearing Scheduled: August 22, 2017
9:00 a.m. Portland Bankruptcy Courtroom
Objection date: August 21, 2017*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

IN RE:

Irvin B. Krukenkamp and
June E. Krukenkamp,
Debtors

CHAPTER 11
CASE NO. 17-20412

Debtors' Motion for Continuation of the Automatic Stay

Irvin and June Krukenkamp (hereafter the "Debtor") hereby move this Court, pursuant to section 362(c)(3)(B), for an order continuing the automatic stay provided under section 362(a) as to all creditors. In support of this motion, the Debtor states as follows:

1. The Debtor commenced this case by filing a petition under Chapter 11 on August 1, 2017.
2. The Debtor had filed a previous case which commenced in Chapter 13 (case number 16-20484). That case was converted to Chapter 11 on November 17, 2016 and was ultimately dismissed on the Debtor's motion on July 24, 2017. The prior case was dismissed for the reasons set forth in the Motion to Dismiss (DE#53).
3. The Debtor has filed this second case in order to effectuate a reorganization which will result in satisfaction of outstanding income tax debt, payment in full of a loan secured by a motor vehicle, and discharge overwhelming unsecured debt subject to the requirements of the Bankruptcy Code.
4. The petition in this case has been filed in good faith. The Debtor believes that he will be able to propose and have confirmed a Chapter 11 plan and that he will be able to fully perform under the terms of the plan.
5. The Debtor's prior chapter 11 case, dismissed on July 24, 2017, was the only previous case by the Debtor that was pending during the preceding year.

6. The Debtor's prior Chapter 11 case was not dismissed because the Debtor failed to file or amend the petition or any required documents, or to provide adequate protection payments ordered by the court, or to perform the terms of a plan confirmed by the Court.

7. The Debtor's prior Chapter 11 case was not dismissed at a time when there had been a motion for relief that was pending before the court or resolved with an order terminating, conditioning, or limiting the stay.

WHEREFORE, the Debtor requests that this Honorable Court continue the automatic stay under section 362(a) as to all creditors for the duration of this Chapter 11 proceeding, or until such time as the stay is terminated under section 362(c)(1) or (c)(2), or a motion for relief is granted under section 362(d); and grant such other and further relief as the Court may deem just and equitable.

Dated this 12th day of August, 2017.

Respectfully submitted,

/s/ Lee Anne Graybeal
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